### UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

#### UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 21-cv-10928

v.

Honorable Denise Page Hood

\$3,840,772.58 U.S. dollars constituting 125 international wire transfers seized From U.S. correspondent bank, Citibank, between December 21, 2020 and January 4, 2021,

\$1,025,446.18 U.S. dollars constituting 42 international wire transfers seized from U.S. correspondent bank, JPMorgan Chase Bank, between December 21, 2020 and January 4, 2021,

\$765,143.73 U.S. dollars constituting 40 international wire transfers seized from U.S. correspondent bank, Bank of New York Mellon, between December 21, 2020 and January 4, 2021,

\$145,466.52 U.S. dollars constituting 6 international wire transfers seized from U.S. correspondent bank, Mashreq Bank PSC, between December 21, 2020 and January 4, 2021,

\$387,337.51 U.S. dollars constituting 13 international wire transfers seized from U.S. correspondent bank, Standard Chartered Bank, between December 21, 2020 And January 4, 2021,

\$159,616.77 U.S. dollars constituting 6 international wire transfers seized from U.S. correspondent bank, Deutsche Bank Trust Company Americas, between December 21, 2020 and January 4, 2021,

\$2,288,936.63 U.S. dollars constituting 67 wire transfers seized from U.S. correspondent bank, Citibank, N.A., between May 3, 2021 and May 21, 2021,

\$1,449,112.82 U.S. dollars constituting 44 wire transfers seized from U.S. correspondent bank, JPMorgan Chase Bank, between May 3, 2021 and May 21, 2021,

\$1,348,713 U.S. dollars constituting 44 wire transfers seized from U.S. correspondent bank, Bank of America, between May 3, 2021 and May 21, 2021,

\$636,373.90 U.S. dollars constituting 28 wire transfers seized from U.S. correspondent bank, Bank of New York Mellon between May 3, 2021 and May 21, 2021,

\$20,155 U.S. dollars constituting 2 wire transfers seized from U.S. correspondent bank, Deutsche Bank and Trust Company Americas; between May 3, 2021 and May 21, 2021, and

\$34,000 U.S. dollars constituting 2 wire transfers seized from U.S. correspondent bank, Mashreq Bank PSC, between May 3, 2021 and May 21, 2021,

Defendants,

FAR EAST FOOD TRADING, LLC

Claimant.

### **VERIFIED CLAIM**

Claimant Far East Food Trading, LLC, by and through Undersigned Counsel, hereby files this Verified Claim pursuant to 18 U.S.C. § 938(a)(4)(A) and Rules G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims, and hereby states the following:

 The identities of the specific properties being claimed are the funds associated with the following wire transactions, as identified in the Second Amended Complaint for Forfeiture in the above-styled case:

Wire No.	Wire Date	Amount	
271	5/3/2021	\$35,765.00	
272	5/3/2021	\$19,289.00	
273	5/3/2021	\$28,365.00	
274	5/4/2021	\$26,865.00	
275	5/5/2021	\$10,405.00	
276	5/6/2021	\$44,025.00	
277	5/6/2021	\$18,000.00	

2. The identity of Claimant is Far East Food Trading, LLC ("Claimant Far East Food"). Claimant Far East Food is a foreign company established under the laws of the country of the United Arab Emirates with its primary office located at Office no. 2006-64, Binary Tower, Business Bay Area, Dubai, UAE, PO box: 7800.

- 3. Claimant Far East Food has a valid and legal interest in all of the seized properties listed in Paragraph 1 of this Verified Claim as Claimant Far East Food is the corporate owner of all of the seized properties.
- 4. Ahmed Awad Matar Juma and Muhammad Aslam Syed are the owners of Claimant Far East Food.
- 5. Claimant Far East Food acquired the properties listed in Paragraph 1 of this Verified Claim through lawful and legitimate means.

This 21st day of January 2022.

Is/Rebecca L. Castaneda
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# **VERIFICATION**

Pursuant to 28 U.S.C. § 1746, Muhammad Aslam Syed, owner of Claimant Tropica, hereby declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of January 2022.

Muhammad Aslam Syed Owner of Tropica, LLC

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Verified Claim has been electronically filed on January 21, 2022, with the Clerk of the Court using the CM/ECF system which will automatically transmit an electronic filing to all parties of record.

s/Rebecca L. Castaneda
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